



File Code: 1950-1/2320-1/2720-1

Date: December 15, 2021

Route To: (1950), (2320) (2720)

Subject: Continued Authorization of Tent Platform Sites in Stikine-LeConte Wilderness
2022-2026

To: Files

This letter to the files concerns the continued authorization of temporary tent platforms sites within the Stikine-LeConte Wilderness for the next five years (CY 2022-2026).

In 2021, an interdisciplinary team (IDT) on the Tongass National Forest reviewed the existing environmental analysis and past Decision Memos for tent platform sites within the Stikine-LeConte Wilderness. The team reviewed the conditions and uses on the ground and found the tent platforms still fit within the past environmental analysis and decisions. The interdisciplinary team identified no significant impact on the wilderness resource from the temporary tent platform use. It was noted that the presence of Wilderness can be an extraordinary circumstances in environmental analysis. As the legislation that designated the Stikine-LeConte Wilderness provides for temporary structures, including tent platforms, necessary for the taking of fish and wildlife (including moose hunting), an extraordinary circumstance is null. Sensitive, Threatened and Endangered species considerations were updated by the IDT to include all current listings for the area. An invasive plants risk assessment was also reviewed completed for the tent platform sites.

According to Forest Service Handbook 1909.15-2012-3 Section 18.3, Reconsideration of Decisions Categorically Excluded from Environmental Documentation, no further National Environmental Policy Act (NEPA) action will be taken if an interdisciplinary review shows that the proposed action still fits within the identified category, and no extraordinary circumstances exist. As the IDT found the proposal to continue the permitted use of temporary tent platforms still fits within the previous decisions, and no extraordinary circumstances exist; I am not issuing a new NEPA decision. The action continues to be categorically excluded from documentation in an environmental impact statement or environmental assessment This action falls within a category of actions which are not subject to administrative review (objection process) opportunities. Implementation of this decision may occur immediately.

The Wrangell District Ranger is the Deciding Official on tent platform continuation in Wilderness. On August 29, 1995, the Forest Supervisor, Stikine Area, delegated the Wrangell District Ranger the authority to approve NEPA decision documents regarding continued use of tent platform sites.

Action: This letter documents the IDT analysis and my action to authorize up to eighteen-tent platform sites for the next five years within the Stikine-LeConte Wilderness based on the environmental analysis and Decision Memos from 1995, 1998, 2002, 2007 and 2011. TABLE 1, and the TENT PLATFORM MAP, attached to this document, list and identify the locations of



the eighteen tent platform sites. Five of the tent platform sites are currently permitted and occupied with structures. The remaining thirteen sites are vacant of permitted structures. I will continue to approve authorizations for the three occupied sites, and issue new authorizations for the fifteen vacant sites, as needed to serve the public during the next five years (CY 2022-2026). This action to approve tent platform continuation is consistent with the Forest Supervisor's delegation.

Section 1316 of the Alaska National Interest Lands Conservation Act of 1980 (ANILCA) provides for the use of tent platforms necessary for the taking of fish and wildlife. The Forest Service Manual, Alaska Wilderness Supplement (R10 Supplement 2300-2008-2 (11/25/2008), section 2323.04d, (12)) states the Forest Supervisor is responsible to approve temporary facilities related to the taking of fish and wildlife. On September 29, 1995, the Forest Supervisor, Stikine Area, delegated the Wrangell District Ranger the authority to issue special use permits for temporary tent platforms for the taking of fish and wildlife on sites that have been approved by the NEPA process. The Tongass Land and Resource Management Plan 2016 (TLRMP), Wilderness Management Prescription, limits tent platform permits to a period not to exceed five years, which may be renewed. (Land2. E.1, page 3-12) My decision to issue tent platform permits is consistent with that Supervisor's delegation and the TLRMP direction.

Past NEPA

Tent platforms have been approved through four Decision Memos issued during the past years. In 1995, two environmental analyses were conducted for the renewal of existing special use permits and the issuing of new permits for tent platforms and cabins in the Wilderness. The Wrangell District Ranger's Decision Memo of June 1, 1995, in part approved the renewal of four existing tent platform permits; while the Forest Supervisor's Decision Memo of October 20, 1995, approved 11 new tent platform sites. The Forest Supervisor issued a Decision Memo on July 14, 1998 approving another tent platform site. The Wrangell District Ranger issued a Decision Memo on September 3, 2002 approving an additional new tent platform site. Lastly, the Forest Supervisor issued a Decision Memo on August 16, 2007 approving another tent platform site. A total of eighteen (18) tent platform sites in the Stikine-LeConte Wilderness have been approved in the past.

In 2000, 2001, 2007, 2011, 2016 and 2021 interdisciplinary teams on the Tongass National Forest reviewed the existing environmental analysis and Decision Memos for tent platforms within the Stikine-LeConte Wilderness. They found that the continuation of the tent platforms still fit within the identified category for exclusion from further environmental analysis in an EIS or EA; and there were no extraordinary circumstances. The Wrangell District Ranger has issued letters on October 20, 2000, authorizing tent platforms for CY2001; November 20, 2001, authorizing tent platforms for CY2002-2006; and May 8, 2007 authorizing tent platforms for CY2007-2011; and November 21, 2011 authorizing tent platforms for CY2002-2016, (FSH 1909.15, section 18.3), and July 25, 2016 authorizing tent platforms for CY2017-2021, (FSH 1909.15, section 18.3).

Minimum Requirement Analysis

The Forest Service Manual, Alaska Wilderness Supplement (R10 2300-2008-2 (11/25/2008), section 2322.03 (6) states that all management decisions affecting wilderness must be consistent with the minimum requirement concept in the Wilderness Act. A Minimum Requirements Analysis (MRA) using a Minimum Requirement Decision Guide or other similar two-step process is to be used. The minimum requirement concept will be applied to the prohibited uses in Section 4(c) of the Wilderness Act unless the uses are authorized under ANILCA. The Wilderness Act generally prohibits structures in Wilderness, but ANILCA provides for the use of temporary structures necessary for the taking of fish and wildlife

The Wrangell Ranger District has received applications for the construction and maintenance of tent platforms as needed to support moose hunting in the Stikine River valley, within the Stikine-LeConte Wilderness. I have determined that the facilities are needed as a practical necessity to support legal hunting activities that occur within the Wilderness.

Section 1316 of ANILCA provides for the use of temporary equipment and facilities, including tent platforms, necessary for the taking of fish and wildlife. Forest Service Handbook, R10 Supplement 2709.11-2021-1, 41.2(5)(3) (8/6/2021) includes the following direction: The size of temporary facilities may vary but may not exceed 320 square feet. Outbuildings up to a total of 150 square feet, plus an outhouse, may be approved. Partial walls for tent platforms may not extend more than 4 feet above the floor. Only the tent fabric, ridgepole, door, and its support poles may extend more than 4 feet above the floor.

The Tongass Land and Resource Management Plan 2008, Wilderness Management Prescription, includes some direction (Land2. E.7(a), page 3-12) The time of occupancy for the tent platform is limited to coincide with hunting season for the species for which the temporary facility is being used. The annual moose hunting season in the Stikine River is from September 15 through October 15. At the end of the specified occupancy, tents will be taken down and tent platforms laid flat. Unnecessary equipment will be removed from the site. Temporary structures will be built with materials that blend with and are visually compatible with the surrounding landscape.

Temporary tent platform camps are the least intrusive customary and traditional structure allowed by ANILCA for moose hunters to use in the Wilderness. I find those temporary tent platforms are the "minimum tool" needed to facilitate moose hunter's camps.

Following are some conditions that I will include in the tent platform permits to ensure protection of the wilderness resource.

1. The tent, tent frame and partial walls may be erected for use no more than 60 days per year. The time of occupancy for the tent platform is limited to coincide with the annual moose-hunting season in the Stikine River valley. At the end of that period the tent will be taken down and the tent frame laid flat on the platform. Unnecessary equipment will be removed from the site.
2. The outhouse shall cover a pit toilet and shall not exceed 3 ft. by 3 ft. The outhouse pit shall be constructed and maintained in a manner that minimizes the potential for small mammals and amphibians fall in and become trapped in the pit.

3. Within a Wilderness, sites are managed so as to preserve their natural condition with the imprint of man's work substantially unnoticeable. The tent platform, tent and outhouse must be made of materials and colored to blend with and be visually compatible with the surrounding landscape. Colors of earth tones such as browns, dull shades of green or camouflage are encouraged.
4. The permit area is within an area where brown bears have been reported. The holder must use bear-proof food storage and garbage disposal methods to prevent habituation of bears to human foods and reduce the likelihood of bear-human incidents.
5. The tent platform special use permits will not authorize any motorized equipment at the site.

This letter to the files documents the approval of temporary tent platforms for moose hunting within the Stikine-LeConte Wilderness for the next five years (CY 2022-2026).



CLINT R. KOLARICH
District Ranger

TABLE 1
TENT PLATFORM SITES WITHIN THE STIKINE-LECONTE WILDERNESS

	GENERAL LOCATION	LEGAL LOCATION	PERMIT HOLDER
1	DRY ISLAND, NORTH ARM	NE/SE/SE SEC 15 T60S, R 82E	JARRED OLSON
2	DRY ISLAND, NORTH ARM	NE/SE/SW SEC 14 T60S, R 82E	DAVID BENITZ
3	FARM ISLAND, NORTH ARM	SE/NE/SE SEC 18 T60S, R 83E	STEPHEN CONNOR
4	SERGIEF ISLAND, MAIN ARM STIKINE RIVER	NW/NE/SW SEC 14 T61S, R83E	VACANT
5	WARM SPRINGS ISLAND, KETILI RIVER (PRUCI TREE)	NW/NW/NE SEC 11 T60S, R85E	VACANT
6	WIZARD (ROCK) ISLAND, STIKINE RIVER	NE/NW/NE SEC 15 T60S, R85E	VACANT
7	MAINLAND, KETILI RIVER, ACROSS GROSS TREE)	SW/SW/SE SEC 12 T60S, R85E	VACANT
8	MAINLAND, KETILI RIVER, (BENJAMIN TREE)	SW/NW/SE SEC 12 T60S, R85E	VACANT
9	MAINLAND, KETILI RIVER (BELOW HOT TUB SLOUGH)	SW/SE/SW SEC 28 T59S, R85E	ROLLAND HOWELL
10	MAINLAND, KETILI RIVER (UPPER END)	SW/SW/SW SEC 7 T60S, R86E	VACANT
11	MAINLAND, SHAKES SLOUGH (WEST SHORE)	SE/NE/SE SEC 26 T59S, R84E	VACANT
12	MAINLAND, STIKINE RIVER (NORTH SHORE BELOW SHAKES SLOUGH)	NE/NE/NE SEC 3 T60S, R84E	CHARLES JENKINS
13	MAINLAND, STIKINE RIVER, (NORTH SHORE BELOW KETILI RIVER)	NE/SE/NW SEC 31 T59S, R85E	VACANT
14	MAINLAND, KETILI CREEK	SW/NE/SE SEC 2 T60S, R85E	VACANT
15	MAINLAND, BARNES (PARADISE) LAKE	SW/SW/NE SEC 17 T60S, R86E	VACANT
16	MAINLAND, NORTH ARM STIKINE RIVER AND COHO CREEK	NW/NW/NW SEC 10 T60S, R82E	VACANT
17	LIMB ISLAND, HOOLIGAN SLOUGH	NW/SE/SW SEC 11 T60S, R83E	VACANT
18	DRY ISLAND, KNIG SLOUGH	NE/SW SEC 23 T60S, R82E	VACANT

TENT PLATFORM MAP